Yale University
Institutional Standards of Conduct

Purpose

Yale's mission is to improve the world today and for future generations through outstanding research and scholarship, education, preservation, and practice. Successful pursuit of this mission – including Yale's ability to attract and develop exceptional faculty, students, and staff – depends in part on a shared commitment to Yale's standards of conduct, which all members of the Yale community are responsible for upholding. Accordingly, this document articulates a set of ethical, legal, and professional standards which govern and guide the everyday actions of members of the Yale community as they contribute to Yale's mission. These standards are further reflected and refined in many of the University's policies, procedures, statements, and reports, as well as in many of the laws, regulations, and other obligations applicable to Yale.

Applicability

The Institutional Standards of Conduct (formerly the Standards of Business Conduct) apply to all Yale faculty and staff in a manner consistent with the Faculty Handbook and other University policies. For example, these Institutional Standards are consistent with and complement the Faculty Standards of Conduct, and both sets of standards are included in the Faculty Handbook.

Standards

1. **Integrity, Honesty, and Ethical Conduct**
Every faculty and staff member must be vigilant in protecting and advancing Yale's mission by holding themselves and all members of the Yale community to the University's high standards for integrity, honesty, and ethical conduct, including the expectations described in detail in the policies and procedures of the University.[1]

2. **Individual Responsibility and Accountability**
Yale faculty and staff must assume and exercise responsibility appropriate to their positions and roles. This includes responsibility for understanding and adhering to the current requirements and expectations applicable to their Yale activities. They must exercise sound judgment, and they are accountable to each other, to the University, and to themselves for their actions and their decisions not to act. Managers, supervisors, and those who delegate work to others are responsible for overseeing their subordinates. When roles or responsibilities are unclear, faculty and staff are expected to reach out to the appropriate individual(s) at Yale to obtain guidance.[2]

3. **Freedom of Expression**
The free exchange of ideas is necessary for the discovery and dissemination of knowledge, and Yale is committed to maintaining an environment where freedom of expression can flourish. Every faculty and staff member has a responsibility to respect the appropriate exercise of free expression.[3]

4. **Respect for Others**
Yale seeks to create a vibrant community, in which all members are treated with respect and feel welcome to make their voices heard. Yale does not tolerate discrimination or harassment on the basis of sex, sexual orientation, gender identity or expression, race, color, national or ethnic origin, religion, age, disability, or status as a special disabled veteran, veteran of the Vietnam era or other covered veteran.[4]

5. Compliance with Laws, Regulations, Policies, and Procedures

Yale faculty and staff must comply with federal, state, and local laws and regulations that apply to their Yale activities. They also must comply with applicable University policies and procedures, which are often designed to meet legal and regulatory requirements. Faculty and staff must keep themselves informed about such requirements. When in doubt about the interpretation of an applicable law or regulation, Yale faculty and staff are expected to seek advice from the Office of the General Counsel. When questions arise pertaining to the interpretation or applicability of a policy or procedure, they are expected to contact the individual and/or department listed as responsible for oversight of the relevant policy or procedure.[5]

6. Compliance with Contractual, Grant, and Other Obligations

The University frequently enters into contractual arrangements and other formal relationships with outside parties that create binding legal obligations for Yale. These obligations are embodied, for example, in grant agreements to support research or contracts for the purchase of goods or services. Yale faculty and staff must comply with all applicable obligations assumed by the University. Only individuals who have authority delegated by the Yale Corporation or an appropriate University official may enter into or sign agreements on behalf of Yale or otherwise bind the University.[6]

7. Internal Controls

Internal controls are the mechanisms, rules, and procedures implemented by Yale to safeguard University assets, promote efficient operations, ensure the integrity of financial and accounting information, promote accountability and compliance, and prevent fraud. Internal controls include adequate segregation of duties, conscientious adherence to approval authorities, and appropriate oversight of operational activities. Yale faculty and staff are expected to fulfill their internal controls responsibilities.[7]

8. Health and Safety

Yale maintains a comprehensive set of health and safety policies, guidelines, and standards designed to support a strong culture of safety. The collective commitment by faculty and staff to these sound behaviors helps reduce injuries, accidents, and environmental impact and ensure regulatory compliance. Key focus areas include proper attire and use of personal protective equipment, training, personal responsibility for safety of oneself and others, knowledge and execution of work protocols and emergency response, prompt reporting of incidents, proper handling and disposal of hazardous materials, and escalating issues of concern.[8]

9. Appropriate Use of University Resources

Yale is committed to prudent stewardship of the resources entrusted to the University by its donors, research sponsors, and other funders and collaborators, particularly in light of the tax-exempt status conferred upon Yale due to its non-profit mission. Yale faculty and staff must treat University resources with care, expend funds and use property prudently, and apply Yale's stewardship and sustainability principles. This includes expending research funds in accordance with applicable sponsor requirements and expending donor funds in accordance with applicable contractual restrictions. They must not use University funds, property, or facilities for their personal benefit or for the benefit of a non-University organization, without proper approval.[9]

10. Conflicts of Interest and Conflicts of Commitment

Yale faculty and staff must be aware of the potential for conflicts of interest generated by their non-Yale (outside) activities or financial interests that could—or could be perceived to—directly and significantly influence the conduct of their work at the University. Potential conflicts of interest must be disclosed to the university, reviewed, and appropriately managed or eliminated. Several University policies require certain faculty and staff to regularly report their outside activities and financial interests so that potential, actual, or apparent conflicts of interest can be identified and addressed. Other University policies require faculty and

staff to refrain from certain activities to avoid creating conflicts of interest. For example, faculty and staff may not accept personal gifts, gratuities, or payments, in cash or in kind, from any vendor seeking to do business with Yale or currently doing business with Yale, except as permitted by Yale policy. Faculty and staff also must avoid engaging in outside activities that would create a conflict of commitment. A conflict of commitment occurs when the commitment to external activities of a faculty or staff member adversely affects their capacity to meet University responsibilities.[10]

11. Privacy and Confidentiality
Yale faculty and staff receive and generate a variety of confidential and private information, including personally identifiable information about students, patients, employees, and research subjects, as well as confidential business information and intellectual property from Yale and its research and business partners. Legal and contractual requirements, as well as Yale policies and procedures, prohibit unauthorized access to or use of such information. Yale faculty and staff are permitted to access, use, or disclose such information only in accordance with applicable restrictions.[11]

12. Information Security
Yale faculty and staff are responsible for understanding Yale's information security risks and taking appropriate steps to ensure the security of Yale information and systems. Faculty and staff must meet their obligations, as defined in Yale policy, to protect the information they handle. Yale has specific reporting obligations for cybersecurity incidents; as such, faculty and staff are expected to report all potential cyber incidents to the Information Security Office in a timely manner and cooperate in any incident response.[12]

13. Reporting Violations and Non-Retaliation
Yale faculty and staff are strongly encouraged to report suspected violations of these Standards and the laws and policies they address. Yale does not tolerate retaliation against a person who, in good faith, files a complaint, reports a concern, or cooperates with a University investigation. Retaliation can take different forms and could include actions such as unjustified discipline or termination, verbal abuse or bullying, or unfavorable changes to working conditions or other terms of employment. Yale firmly enforces its policy against retaliation and provides resources for those with questions or concerns about violations.[13]

The Yale University Hotline offers phone and online reporting options, including anonymous reporting. The University also maintains a list of offices, Guidance on Whom to Call, that can address specific issues.

Discipline

Failure to adhere to these Standards may result in discipline in accordance with Yale's established disciplinary processes. Such processes applicable to faculty are documented in the Faculty Handbook. Processes for managerial and professional staff are documented in the Staff Workplace Policies. Processes for union members are documented in the applicable labor agreement.

Endnote References

[1] Policies, procedures, and resources of the University pertaining to integrity and ethical conduct include, but are not limited to, the Faculty Handbook, Policy 1101 *Guiding Principles for University Operations*, Academic Integrity, and Responsible Conduct of Research.

[2] Policies and procedures of the University pertaining to individual responsibility and accountability include, but are not limited to, the Faculty Handbook and Policy 1101 *Guiding Principles for University Operations*.

[3] Policies, procedures, and resources of the University pertaining to freedom of expression include, but are not limited to, the Faculty Handbook and the Report of the Committee on Freedom of Expression at Yale.

[4] Policies, procedures, and resources of the University pertaining to respect for others include, but are not limited to, Belonging at Yale, Policy 9000 *Yale University Policy Against Discrimination and Harassment,* and Office of Institutional Equity & Accessibility.

[5] Additional information on the appropriate offices to contact is available at Guidance on Whom to Call.

[6] Policies, procedures, and resources of the University pertaining to the authority to sign contracts and other formal arrangements include, but are not limited to, Policy 1104 *University Signature Authority* and Signature Authority Tool.

[7] Policies and procedures of the University pertaining to internal controls and approval authority include, but are not limited to, Policy 1101 *Guiding Principles for University Operations* and Procedure 1101 PR.06 *Approval Authority*.

[8] Policies and procedures of the University pertaining to health and safety include, but are not limited to, Yale Environmental Health & Safety: Policies & Procedures.

[9] Policies, procedures, and resources of the University pertaining to the appropriate use of University resources include, but are not limited to, Policy 1101 *Guiding Principles for University Operations*, Policy 2200 *Gifts to the University*, Policy 1301 *Sponsored Projects Financial Reporting and Financial Closeout*, Policy 3303 *Gifts from University Funds*, Policy 3201 *General Purchasing*, and Yale Sustainability.

[10] Policies, procedures, and resources of the University pertaining to conflicts of interest and conflicts of commitment include, but are not limited to, Yale University Policy on Conflict of Interest, the Faculty Handbook, Staff Workplace Policies*: Conflict of Interest*, Policy 2201 *Gifts from External Parties to Employees*, Policy 3201 *General Purchasing*: Section 3201.1 *Ethical Practices*, and Interactions Between Clinical Personnel of Yale Medicine and Industry.

[11] Policies, procedures, and resources of the University pertaining to privacy and confidentiality include, but are not limited to, University Privacy Office: Resources and Office of Sponsored Projects: Resources.

[12] Policies, procedures, and resources of the University pertaining to information security include, but are not limited to, Policy 1601 *Information Access and Security*, Policy 1604 *Data Classification Policy*, Policy 1607 *Information Technology Appropriate Use Policy*, and Yale Information Security: Cybersecurity.

[13] Policies, procedures, and resources of the University pertaining to non-retaliation include, but are not limited to, the Faculty Handbook, Staff Workplace Policies, and Policy 9000 *Yale University Policy Against Discrimination and Harassment*.